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9
10 **UNITED STATE DISTRICT COURT**
11
12 **NORTHERN DISTRICT OF CALIFORNIA**
13

14 DAVID FERNANDEZ, an individual and
15 borrower,

16 Plaintiff,

17 vs.

18 FRANKLIN CREDIT MANAGEMENT
19 CORPORATION, a business entity; and DOES
20 1 through 10 inclusive,

21 Defendants.

Case No: 3:16-cv-02837-JCS

22 **STIPULATION EXTENDING**
23 **DEADLINE TO FILE DEFENDANT'S**
24 **RESPONSIVE PLEADING TO**
25 **PLAINTIFF'S COMPLAINT**

Pursuant to Civil L.R. 6-1

26 **TO THE HONORABLE COURT AND ALL ATTORNEYS OF RECORD:**

27 **PLEASE TAKE NOTICE** that Plaintiff DAVID FERNANDEZ ("Plaintiff"), and
28 Defendant FRANKLIN CREDIT MANAGEMENT ("Defendant"), by and through their
respective counsel of record, do hereby stipulate and agree as follows:

1. This matter was removed to the above Court on May 26, 2016.
2. Defendant's response to Plaintiff's Complaint is due June 2, 2016.
3. Counsel for Plaintiff and Defendant have engaged in preliminary settlement discussions, with the goal of providing an early resolution to this matter.
4. The Parties will require additional time to explore these settlement options, and would like to do so while limiting fees and costs incurred in litigation at this stage.

5. Accordingly, Plaintiff and Defendant agree that Defendant's deadline to respond to Plaintiff's Complaint shall be extended approximately 30 days to July 1, 2016.

Respectfully submitted,

WRIGHT, FINLAY & ZAK, LLP

Dated: May 31, 2016

By: s/ Joshua R. Hernandez, Esq.
Robin P. Wright, Esq.
Joshua R. Hernandez, Esq.
Attorneys for Defendant, FRANKLIN
CREDIT MANAGEMENT
CORPORATION

Respectfully submitted,

REAL ESTATE LAW CENTER, PC

Dated: May 31, 2016

By: s/ Tala Rezai, Esq.
Erikson M. Davis, Esq.
Tala Rezai, Esq.
Attorneys for Plaintiff, DAVID
FERNANDEZ

Dated: June 2, 2016

